

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

PAULA GABRIEL,)	Civil Case No. 2:21-cv-687
)	
Plaintiff,)	
)	HONORABLE PATRICIA L. DODGE
v.)	
)	
XYLEM, INC., XYLEM WATER)	
SOLUTIONS ZELIENOPLE, LLC)	
MICHEAL CRAIG and SEAN)	
PETRAITIS,)	
)	
Defendants.)	

MOTION TO WITHDRAW

COMES NOW, counsel for the Plaintiff, LAW OFFICES OF JOEL SANSONE, JOEL S. SANSONE, ESQUIRE, MASSIMO A. TERZIGNI, ESQUIRE, and ELIZABETH A. TUTTLE, ESQUIRE, and hereby move this Honorable Court to permit undersigned counsel and his law firm to withdraw their appearance in the above-captioned case for the following reasons:

1. Plaintiff filed her original Complaint on May 21, 2021.
2. Plaintiff filed an Amended Complaint on October 18, 2021.
3. Defendants Xylem, Inc., and Xylem Water Solutions Zelienople LLC filed their Answer to Plaintiff's Amended Complaint on November 1, 2021.
4. Plaintiff and her counsel have developed irreconcilable differences.
5. Because of these irreconcilable differences, undersigned counsel cannot properly discharge their duties.
6. Undersigned counsel respectfully request that they be permitted to withdraw from this case.

WHEREFORE, for all of the above reasons, undersigned counsel respectfully request that this Honorable Court enter an Order withdrawing their appearance from this matter.

Respectfully submitted,

LAW OFFICES OF JOEL SANSONE

s/ Joel S. Sansone

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Dated: March 23, 2022